

THE WEITZ LAW FIRM, P.A.

USDC SDNY
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VIA CM/ECF

Honorable Judge Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007-1312

Pursuant to the Undersigned Individual Practices in Civil Cases, Plaintiff, in making an extension request, must indicate whether Defendant consents and, if not, the reasons given by Defendant for refusing consent. Plaintiff has failed to do so. Plaintiff's request is therefore denied.

The Court further directs Plaintiff to the Undersigned's Emergency Individual Rules and Practices in Light of COVID-19, which provide that "Unless otherwise ordered by the Court, all conferences and proceedings in civil cases will be held by telephone."

SO ORDERED.

Re: Velasquez v. 44 Water Street, Inc., et al
Case 1:19-cv-06908-AJN

Dear Judge Nathan:

The undersigned represents the Plaintiff in the above-captioned case matter.

Due to the ongoing health crisis caused by the COVID-19 pandemic, and the tumultuous economic effects it is causing to virtually all businesses open to the public (including possible complete closures), such as the business involved in this matter, Plaintiff's undersigned counsel hereby respectfully requests that the Court grant a thirty (30) day stay of all deadlines and/or Conference in this matter.

Further, since undersigned counsel is based in Florida, an in-person Conference would require possible unsafe roundtrip travel from Florida to New York (in both of which official states of emergency has been declared). In fact, recently a passenger on a similar JetBlue flight from New York to Florida had tested positive for COVID-19. In addition, undersigned counsel suffers from an underlying asthmatic-type health condition which, potentially, would be adversely affected by the COVID-19 virus. However, in the event that the Court decides not to stay this matter, then, in the alternative, undersigned counsel respectfully requests that any future Conference be conducted telephonically, which is in accordance with SDNY's Chief Judge Coleen McMahon's recent March 13, 2020 Standing Order that "Judges are strongly encouraged to conduct court proceedings by telephone or video conferencing where practicable."

The Court may wish to note that this is undersigned counsel's first request to stay this matter. Thank you for your consideration of this unexpected, but essential, request.

Sincerely,

By: /S/ B. Bradley Weitz

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